



UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

United States of America,  
Plaintiff,  
v.

1. Julian Anthony Ross,  
(Counts 1 - 5)  
2. Paul Norman Bayliss,  
(Counts 1-2)  
Defendants.

C-11 506 PHX ROS 114

**INDICTMENT**

VIO: 21 U.S.C. §§ 846  
(Conspiracy to Possess with Intent  
to Distribute)  
Count 1

21 U.S.C. §§ 841(a)(1) and  
(b)(1)(B)(viii)  
(Possession with Intent to  
Distribute)  
Count 2

18 U.S.C. §§ 922(g)(1) and  
924(a)(2)  
(Felon in Possession of  
Firearm)  
Counts 3-5

**THE GRAND JURY CHARGES:**

**COUNT 1**

On or about July 16, 2010, in the District of Arizona, JULIAN ANTHONY ROSS and PAUL NORMAN BAYLISS did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with other persons known and unknown to the Grand Jury, to possess with the intent to distribute 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States

1 Code, Section 841(a)(1) and 841(b)(1)(B)(viii).

2 In violation of Title 21, United States Code, Section 846.

3  
4 **COUNT 2**

5 On or about July 16, 2010, in the District of Arizona, JULIAN ANTHONY ROSS and  
6 PAUL NORMAN BAYLISS did knowingly and intentionally possess with the intent to  
7 distribute 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a  
8 Schedule II controlled substance.

9 In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

10  
11 **COUNT 3**

12 On or about October 12, 2010, in the District of Arizona, JULIAN ANTHONY ROSS,  
13 having been previously convicted of:

- 14 • Five (5) counts of Aggravated Assault on or about January 16, 1997, Superior Court of  
15 Arizona, Maricopa County, Case Number CR96-90448;  
16 • Attempted Armed Robbery on or about January 16, 1997, Superior Court of Arizona,  
17 Maricopa County, Case Number CR96-90448;  
18 each a crime punishable by imprisonment for a term exceeding one year, did knowingly possess  
19 a firearm, specifically: a Hi-Point pistol, model C9, 9mm caliber; which had been shipped and  
20 transported in interstate and foreign commerce.

21 In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

22  
23 **COUNT 4**

24 On or about November 2, 2010, in the District of Arizona, JULIAN ANTHONY ROSS,  
25 having been previously convicted of:

- 26 • Five (5) counts of Aggravated Assault on or about January 16, 1997, Superior Court of  
27 Arizona, Maricopa County, Case Number CR96-90448;  
28 • Attempted Armed Robbery on or about January 16, 1997, Superior Court of Arizona,

1 Maricopa County, Case Number CR96-90448;  
2 each a crime punishable by imprisonment for a term exceeding one year, did knowingly possess  
3 a firearm, specifically: a Maverick shotgun, model 88, 12 gauge; which had been shipped and  
4 transported in interstate and foreign commerce.

5 In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).  
6

7 **COUNT 5**

8 On or about November 16, 2010, in the District of Arizona, JULIAN ANTHONY ROSS,  
9 having been previously convicted of:

- 10 • Five (5) counts of Aggravated Assault on or about January 16, 1997, Superior Court of  
11 Arizona, Maricopa County, Case Number CR96-90448;  
12 • Attempted Armed Robbery on or about January 16, 1997, Superior Court of Arizona,  
13 Maricopa County, Case Number CR96-90448;

14 each a crime punishable by imprisonment for a term exceeding one year, did knowingly possess  
15 a firearm, specifically: Raven pistol, model P-25, .25 caliber; which had been shipped and  
16 transported in interstate and foreign commerce.

17 In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).  
18

19 A TRUE BILL

20 /S/  
21 FOREPERSON OF THE GRAND JURY  
Date: March 17, 2011

22 DENNIS K. BURKE  
United States Attorney  
District of Arizona  
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24 /S/  
25 SARAH DEJONG  
Special Assistant U.S. Attorney  
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